April 17, 2020

Chairman Ajit V. Pai
Commissioner Michael O’Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: AARP REQUEST FOR FCC ACTION DURING THE COVID-19 CRISIS

Dear Chairman Pai, Commissioners O’Rielly, Carr, Rosenworcel, and Starks:

AARP, on behalf of our 38 million members and all older Americans nationwide, urges the Commission to take sustained action to expand the affordability and availability of communication services to address the unprecedented COVID-19 crisis. The pandemic has highlighted the pressing need for high quality fixed and mobile voice and broadband services that are affordable, reliable, and robust.

Americans of all ages and income levels are now critically dependent on advanced telecommunication services, with millions of individuals now required to continue their work or educational activities from home, while also encouraged to rely on telemedicine to both stem the spread of the virus and offer relief to an overtaxed medical system. Furthermore, social distancing can be promoted, and social isolation mitigated, through the use of video conferencing technology. However, the benefits of advanced telecommunication technologies needed to achieve these objectives are not reasonably available or affordable for many Americans.

AARP appreciates the Commission’s recent action waiving the Lifeline program’s recertification and reverification requirement. Likewise, the Commission’s recent waiver of E-Rate program rules designed to encourage the distribution of Wi-Fi hotspots to students who have insufficient Internet access at home is another step in the right direction. However, more action is needed to

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1 In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket 11-42, Order, March 17, 2020.
address the fundamental and ongoing problems with broadband access and affordability that the COVID-19 crisis has made all too clear. The Commission should take additional steps to address the universal service crisis.

In the near term, there are immediate measures that the Commission can take to provide relief to Americans at this critical time:

- All fixed and mobile broadband data caps and usage overage charges should be suspended immediately. Households will place increased demand on broadband resources due to requirements to work and educate at home and to rely on telemedicine. Shelter in place and lockdown orders have intensified broadband usage. No consumer should be required to pay data overage charges during the COVID-19 crisis.

- The FCC should encourage broadband providers to offer subsidized or free broadband to nursing homes, assisted living, and other residential care facilities or settings so that residents can make virtual visitations with their families and other loved ones. Nursing home and other facility residents going weeks or months without any visits from loved ones can have very serious health implications, including the negative impacts of social isolation. Virtual visitations can be essential to the emotional, mental, physical, and social well-being of residents. For some residents, these virtual visits may be the difference between life and death.

- Where feasible, the Lifeline minimum service standard for fixed broadband should be increased to at least 100 Mbps downstream and 20 Mbps upstream. Lifeline customers, like those with higher incomes, must now rely on broadband to achieve basic life functions associated with work, access to medicine, and school. High quality broadband should be made available immediately with no increase in fees. For those areas where antiquated DSL continues to be the only option, broadband speeds should be increased to the maximum available on a customer’s line.

- The Lifeline mobile voice telephone minimum service standard should be increased to enable unlimited voice calling and text messages. The Commission’s Lifeline usage allowances were insufficient in the absence of an emergency and ignore the importance of text messaging during times of crisis. Lifting the mobile voice usage cap and adding text messaging to Lifeline voice offerings will provide appropriately increased access to these critical services.

- While the voluntary 60-day pledge regarding disconnection and late fees is a step in the right direction, it is not enough. It is not clear at this time whether 60 days is a sufficient timeframe, as it is likely that economic hardship induced by the COVID-19 crisis will continue beyond May. Disconnections and late penalties for voice and broadband service customers, including Lifeline customers, should be suspended until the public health crisis ends.

- The FCC should also request that broadband Internet service providers review their cybersecurity plans and educate their customers to be vigilant regarding cyber-based
scams and fraud. The Commission should expand its efforts to warn and educate customers regarding cybersecurity issues and telephone scams and take all necessary steps to protect the public against them. Scammers are using the coronavirus crisis as an opportunity to target vulnerable older Americans, and AARP urges you to join AARP and others to reduce the threat fraud poses to our senior population.

AARP appreciates the steps the FCC has already taken to help individuals now, but we believe that further action by the FCC is necessary to ensure that consumers can continue to communicate with loved ones, access health care, learn, and work during this unprecedented time. We look forward to working with you to identify and implement policies that can help keep America connected during this pressing crisis.

Sincerely,

David Certner
Legislative Counsel and Legislative Policy Director
Government Affairs